

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

MARK KUROWSKI,

Plaintiff,

vs.

NUCOR CORPORATION,

Defendant.

CIVIL ACTION NUMBER: 2:09-1513-CWH

MOTION TO ADMIT PRO HAC VICE

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that John K. Linker be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this Court; and
  2. All pleadings and other documents that I file in this case will contain my name, firm name, address and phone number and those of my associate counsel admitted *pro hac vice*; and,
  3. Service of all pleadings and notices as required shall be sufficient if served upon me, it is my responsibility to serve my associate counsel admitted *pro hac vice*; and,
  4. Unless excused by the Court, I will be present at all pretrial conferences, hearings and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
  5. Certification of Consultation (Local Rule 7.02).
- XX Prior to filing this Motion, I conferred with opposing counsel who has indicated that he does not intend to oppose.

- Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reasons:
- No duty of consultation is required because the opposing party is proceeding pro se.

Respectfully submitted,

**TURNER, PADGET, GRAHAM & LANEY, PA**

By:s/ John S. Wilkerson, III

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July 7, 2009